



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

February 1, 2024

VIA ECF

Hon. Dale E. Ho
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: Chinyere Ndidi Mba-Jonas v. Jaddou, No. 23 Civ. 7810 (DEH)

Dear Judge Ho:

This Office represents the government in this action, in which Plaintiff seeks judicial review under the Administrative Procedure Act (“APA”) of the denial of her Form I-600, Petition to Classify Orphan as an Immediate Relative, by U.S. Citizenship and Immigration Services (“USCIS”). I write respectfully pursuant to Part 2(e) of the Court’s Individual Rules and Practices to request a 7-day extension of the government’s deadline to file its cross-motion for summary judgment and opposition to Plaintiff’s motion for summary judgment (i.e., from February 2, 2024, to February 9, 2024), and a corresponding extension of Plaintiff’s deadline to file her opposition to the government’s motion and reply in support of her motion for summary judgment (i.e., from February 16, 2024, to February 23, 2024), with the government’s reply deadline remaining as March 4, 2024.

The government respectfully requests this revised briefing schedule because this Office needs additional time to confer with USCIS and finalize its brief. This is the government’s first request to modify the summary judgment briefing schedule, and briefing would still conclude on the date originally proposed and ordered. Plaintiff consents to this request.

I thank the Court for its consideration of this request.

Application GRANTED.

Respectfully submitted,

The government's deadline to file an opposition to Plaintiff's motion for summary judgment is extended to **February 9, 2024**. Plaintiff's reply is due **February 23, 2024** and the government's reply is due **March 4, 2024**.

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cc: Counsel of record (via ECF)

The Clerk of Court is respectfully requested to close ECF No. 21.

SO ORDERED.

Dale E. Ho
United States District Judge
Dated: February 2, 2024
New York, New York